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8
9 **IN THE UNITED STATES DISTRICT COURT**
10 **FOR THE DISTRICT OF NEVADA**

11 Joseph O'Shaughnessy, *et al.*,
12 Plaintiffs,
13
14 v.
15 United States of America, *et al.*,
16 Defendants.

No. 2:20-cv-00268-RFB-EJY

**UNOPPOSED MOTION TO EXTEND
TIME TO FILE REPLY TO MOTION
TO DISMISS
(FIRST REQUESTED EXTENSION)**

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18 All Defendants, United States of America, Nadia Ahmed, Steven Myhre, Daniel
19 Bogden, Mark Brunk, Rand Stover, Joel Willis, and Daniel Love, hereby move, pursuant
20 to Federal Rule of Civil Procedure 6(b)(1) and Local Rule LR IA 6-1, for a 21-day
21 extension of time to December 24, 2020, to file their Replies to Defendants' Motion to
22 Dismiss (Doc. 44) and Joinder in Motion to Dismiss (Doc. 46).

23 This is Defendants' first requested extension of time to file their Replies.

24 Plaintiffs' Response to the Motion to Dismiss consisted of 34 pages and 117 case
25 citations. The Replies in this matter require review and comment by counsel for multiple
26 federal agencies, as well as, individual Defendants before filing. Review of the Response
27 and cases cited is being pursued with diligence but the quantity and complexity of the issues
28 involved, along with the number of people, requires additional time particularly in light of

1 the difficulties of communication caused by the intervening Thanksgiving holiday.

2 Undersigned counsel Heathcotte and Pomerantz affirm that Plaintiff's counsel
3 Marquiz consents to the granting of this motion.

4 For the foregoing reasons, Defendants respectfully request that the deadline to file
5 an Answer to the First Amended Complaint be extended to December 24, 2020.

6 RESPECTFULLY SUBMITTED this 27th day of November, 2020.

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8 WILLIAM P. BARR
United States Attorney General

9
10 s/ Brock Heathcotte
BROCK HEATHCOTTE
11 Special Assistant United States Attorney, Acting
Under Authority Conferred by 28 U.S.C. § 515

12 *Attorneys for Defendants United States, Ahmed,*
13 *Myhre, Bogden, Brunk, Stover, and Willis*

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15 SKLAR WILLIAMS PLLC

16 /s/ Crane Pomerantz
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21 *Attorneys for the Defendant Love*

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23 IT IS SO ORDERED:

24 
25 UNITED STATES MAGISTRATE JUDGE
26

27 DATED: November 30, 2020
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